

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

SOPHIA BALOW, AVA
BOUTROUS, JULIA COFFMAN,
KYLIE GOIT, EMMA INCH,
SHERIDAN PHALEN,
MADELINE REILLY, OLIVIA
STARZOMSKI, SARAH
ZOFCHAK, TAYLOR ARNOLD,
AMANDA LING, and ELISE
TURKE, Individually and on behalf
of all those similarly situated,
Plaintiffs,
v.

MICHIGAN STATE
UNIVERSITY, MICHIGAN
STATE UNIVERSITY BOARD OF
TRUSTEES, SAMUEL L.
STANLEY JR. and BILL
BEEKMAN,
Defendants.

CIVIL ACTION NO.

DECLARATION

December 24, 2020

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DECLARATION OF TAYLOR ARNOLD

I, Taylor Arnold, declare as follows:

1. I am 21 years old and understand the obligations of an oath.
2. I am currently enrolled at Michigan State University (“MSU”), majoring in Special Education and minoring in Teaching English to Speakers of Other Languages.
3. I am in my senior year at MSU and will be spending the next year performing my student teaching.
4. I am a member of the women’s varsity swimming and diving team at MSU and have been a swimmer on the team since my Freshman year.
5. I am a named plaintiff in this action. I make this declaration in support of plaintiffs’ motion for preliminary injunction.
6. I am personally heartbroken by the prospect that women’s swimming and diving be eliminated as a varsity sport at MSU.
7. I chose Michigan State because growing up my family was a Spartan family. My older sister ended up going to MSU two years before me, and

in those years of visiting and going to sports events with her I fell in love with the feeling of community on campus and the overwhelming Spartan spirit. When I started the recruiting process I pursued other schools too, but Michigan State was always my focus, especially after talking to the current team members and coaches, who exhibited that same Spartan spirit and made me feel like I could be part of that family even before I committed.

8. My teammates have become my best friends - some of them more like family. My coaches and older team members have been mentors to me and helped me through different issues during my college life. I know that I can rely on this “swimming family” beyond my college years. It is this knowledge that makes me so sad for those coming behind me who will not have that team/friend and coach/mentor possibility in swimming and diving MSU.
9. I developed close relationships that were very important to me and shaped my time at MSU and the person I became while at MSU and the person I know I want to be after leaving MSU. I was given information and insight on my sport, my classes, my schedule and other life skills and experience from my coaches and teammates that will not be available to future swimmers and divers attending MSU.

10. My time as a college athlete has taught me how to better deal with adversity. It taught me that sometimes all the hard work may not show in the results but that it doesn't mean you stop working. You are always getting something out of your hard work, even if it is not a better time in the pool. You are getting closer friendships with your teammates. You preserver and come out stronger through working with those around you who have your back, who know what it is like to be in your shoes, and who want to talk to you about it. They want to help you face it and not just put a smile on and gloss over it.
11. Being an alumna of Michigan State Varsity Swim and Dive will now not carry near as much weight or recognition to future employers since it will no longer exist and it won't carry the prestige as a Division 1, Big Ten sport.
12. Additionally, I am personally heartbroken about not being able to be a proud alumna coming back to visit the team and coaches, participating in the alumni meet on Homecoming weekend, and seeing other people that I love go through the same amazing program that I got the chance to experience.
13. Being a member of the MSU Women's Swimming and Diving team made me feel part of something big and important. Competing at the Big

10 level felt special because it is a Power 5 Conference and one of best in country for swim and dive competition.

14. When MSU announced it was going to eliminate our team, I personally felt discredited as MSU was saying that we were not athletically good enough to stay a part of the University. It felt like our dedication, sacrifices, and hard work we put in to better ourselves and our team in the name of MSU, i.e., missing class and having to make up school work, yet maintaining a high GPA, missing out on going home and to social gatherings, yet being very active in the MSU community was not valued and neither were we.
15. The MSU Swimming & Diving team should be the poster team for what MSU says they want in student athletes, athletics, academics, and community service yet MSU does not provide a media day for us and we do not get a team poster. We have maintained the highest team GPA 2 of the last 3 years (the year we did not hold it, men's swimming and diving did).
16. However, MSU has continually discredited women's sports, such as swimming and diving. For example, in approximately 2018-19 the planner provided to the student athletes included a photo of a female diver on the cover. We were very excited to see that. However, when

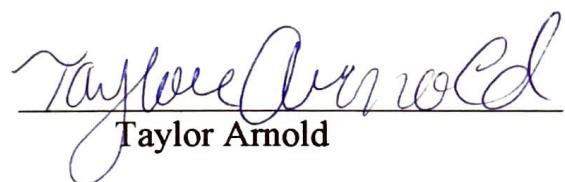
we looked more closely, we did not recognize the diver because she was NOT an MSU diver. Rather than feature one of the female athletes from MSU, the school used a photo of a female diver from a rival Big 10 university (I think Rutgers) but all of the male athletes on the planners were MSU students.

17. We have done good in our community, done well in athletic competition, and have been outstanding in the classroom. We have been recognized for the same, often at athletic banquets but MSU has made clear that this is not what they actually value, only on paper and through lip service.
18. I feel as if the loss of this team hurts for the future and job prospects. Being a Big 10 athlete carries weight, standing, and presence. However, it feels as if that is being taken away at the same time MSU is taking our team away. We are left with no community when returning to campus, no alumni meets, this hurt with my future job search and future job prospects. We are losing meaningful connections. It feels like many of my most important ties to MSU have been lost.
19. Ultimately, the announced end of our program has turned into me no longer feeling proud to have been an MSU student athlete and having no pride in our University.
20. We have been talked down to in this process, we have been lied to by

administration where they seem to be talking out of both sides of their mouth when discussing the cutting of our team. We do not feel respected as we were not part of the process or discussion and never given an opportunity to assist in saving our program despite asking for the same for years.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: December 24, 2020



Taylor Arnold
Taylor Arnold